

EXHIBIT 7

FACSIMILE TRANSMISSION

To:**From:** Kline Preston

Kline Preston Law Group

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To: Mr. Joe P. Leniski, Jr., Esq.

From: Lauren Maclean, Paralegal to Mr. Kline Preston, IV, Esq.

RE: Case No. 3:20-cv-00617

Date: 11/25/2020**Pages:** 6

4. Admit that the pre-recorded messages You and/or No Tax 4 Nash caused to be sent to cellular telephone numbers was a political advertisement on behalf of No Tax 4 Nash.

RESPONSE: DENIED.

5. Admit that You and/or No Tax 4 Nash obtained cellular telephone numbers for the purpose of sending pre-recorded messages as a promotional tactic to generate interest in No Tax 4 Nash's causes.

RESPONSE: DENIED.

6. Admit that You and/or No Tax 4 Nash possess documents which identify the individuals to whom Defendant sent pre-recorded messages.

RESPONSE: DENIED.

7. Admit that You and/or No Tax 4 Nash supplied a list of cellular telephone numbers to the auto-dialer for the purpose of sending pre-recorded messages.

RESPONSE: DENIED.

8. Admit that You and/or No Tax 4 Nash determined which cellular telephone numbers to include on the list of cellular telephone numbers supplied to the auto-dialer.

RESPONSE: DENIED.

9. Admit that You and/or No Tax 4 Nash knew the auto-dialer would be sending pre-recorded messages to the list of supplied cellular telephone numbers.

RESPONSE: DENIED.

10. Admit that You and/or No Tax 4 Nash knew that the auto-dialer would store in its possession the list of supplied cellular telephone numbers.

RESPONSE: DENIED.

11. Admit that You and/or No Tax 4 Nash are responsible for the content of the pre-recorded messages that the auto-dialer sent to the list of supplied cellular telephone numbers.

RESPONSE: DENIED.

12. Admit that You and/or No Tax 4 Nash controlled the content of the pre-recorded messages that the auto-dialer sent to the list of cellular telephone numbers.

RESPONSE: DENIED.

13. Admit that You and/or No Tax 4 Nash created the pre-recorded messages, including the substance of the recording, for pre-recorded messages that auto-dialer sent to the list of cellular telephone numbers.

RESPONSE: DENIED.

14. Admit that You and/or No Tax 4 Nash do not possess any document wherein Plaintiffs directly requested to receive pre-recorded messages to their cellular telephones concerning No Tax 4 Nash.

RESPONSE: ADMITTED.

15. Admit that You and/or No Tax 4 Nash did not receive verbal permission from Plaintiffs to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

16. Admit that You and/or No Tax 4 Nash did not ask verbal permission of Plaintiffs to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

17. Admit that Plaintiffs have never directly given You and/or No Tax 4 Nash a written statement on each of their behalf giving You and/or No Tax 4 Nash permission to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

18. Admit that You and/or No Tax 4 Nash did not ask Plaintiffs for a written statement giving permission to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

19. Admit that You and/or No Tax 4 Nash are not in possession of any document in which Plaintiffs specifically identify You and/or No Tax 4 Nash as having permission to send pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

20. Admit that You and/or No Tax 4 Nash are not aware of the existence of any document in which Plaintiffs specifically identify You and/or No Tax 4 Nash as having permission to send them pre-recorded messages to their cellular telephones.

RESPONSE: ADMITTED.

21. Admit that You and/or No Tax 4 Nash have never had any direct communications with Plaintiffs.

RESPONSE: ADMITTED.

Respectfully submitted,

KLINE PRESTON LAW GROUP

/s/ G. Kline Preston, IV, Esq.
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Attorney for Defendant, Michelle Foreman

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via CM/ECF on the 25th day of November 2020 to the following:

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/s/ G. Kline Preston, IV, Esq.
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